

RE: RM11699, Encryption of Amateur Radio Communications

The use of encryption in the amateur radio service is not permitted under our current rules because it completely defies one of the basic principles of amateur radio communications, which is to provide an open and interoperable radio service for personal, non-pecuniary interest, foster international goodwill, and provide a trained pool of radio operators during times of emergency.

The argument that the applicant has put forth that encryption should be authorized in the amateur radio service is clearly not appropriate use by the letter definition of what our amateur radio service is intended for. Encrypting radio traffic obscures the meaning and makes it impossible for compliance of our rules to be insured. This makes it difficult for both the FCC enforcement and FCC authorized Official Observers (OO) to ensure compliance with our service rules. Encryption limits interoperability, which is a basic and fundamental benefit of the amateur radio service and a foundation of what enables this service to promote international goodwill and pass traffic freely and openly. One of the unique aspects of the amateur radio service is our ability to self-moderate and self-regulate, we do this by observing our fellow amateur radio service licensees and can only do so when traffic is passed in a clear manner without the use of codes or ciphers, which our current rules specifically prohibit on a service wide basis. Take that away, the opportunities for abuse and misuse of the service become vast.

While many governments have recognized the value the amateur radio service can provide in terms of supporting emergency communications and disaster relief, the Commission should not overlook that the primary basis and purpose of the amateur radio service is already defined as one for personal, non-pecuniary interest, and to promote open communications on an international basis- which cannot occur if encryption is utilized on our allocated spectrum. Government agencies and others who choose to utilize amateur radio should do so within our existing rules, and if their needs include encryption or capabilities outside our current and adequate FCC regulations of the amateur radio service, they should be investing in more appropriate government specific radio services, such as FCC part 90 private land mobile radio service.

Respectfully submitted,

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